

# KOBRE & KIM

800 THIRD AVENUE  
NEW YORK, NEW YORK 10022  
WWW.KOBREKIM.COM  
TEL +1 212 488 1200

May 21, 2025

**VIA ECF**

Magistrate Judge Vera M. Scanlon  
U.S. District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Roosevelt Road Re, Ltd. et al. v. Wingate, Russotti, Shapiro, Moses & Halperin, LLP et al.*, Case No. 1:24-cv-06259-NCM-VMS**

Dear Judge Scanlon:

Enclosed as Exhibit A, please find the transcript of the May 14, 2025 Pre-Motion Conference held before Judge Merle. This transcript accompanies the letter certain Defendants filed yesterday, in response to Plaintiffs' request for an initial conference (ECF No. 135). The quotation referenced in Defendants' letter can be found on pages fifteen and twenty-nine of the transcript.

Dated: May 21, 2025  
New York, New York

Respectfully submitted,

**KOBRE & KIM LLP**  
/s/ Jonathan D. Cogan  
Jonathan D. Cogan  
Rachel K. Warren  
Michael Cinnamon  
800 Third Avenue  
New York, NY 10022  
Telephone: (212) 488-1200  
jonathan.cogan@kobrekim.com  
rachel.warren@kobrekim.com  
michael.cinnamon@kobrekim.com

Sydney S. Johnson (*pro hac vice*)  
1919 M Street, NW Suite 410  
Washington, D.C. 20036

Telephone: (202) 664-1900  
[sydney.johnson@kobrekim.com](mailto:sydney.johnson@kobrekim.com)

*Attorneys for Defendants Wingate,  
Russotti, Shapiro, Moses & Halperin,  
LLP; Philip Russotti; Clifford H. Shapiro;  
Kenneth Halperin; and I. Bryce Moses*